

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION**

X CORP.,

Plaintiff,

v.

WORLD FEDERATION OF
ADVERTISERS; UNILEVER PLC;
UNILEVER UNITED STATES, INC.;
MARS, INCORPORATED; CVS HEALTH
CORPORATION; and ØRSTED A/S,

Defendants.

No. 7:24-CV-00114-K

**UNOPPOSED MOTION
TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND**

Pursuant to Fed. R. Civ. P. 6(b), Defendant Mars, Incorporated (“Mars”) seeks an extension of its current September 9, 2024 deadline to answer or otherwise respond to Plaintiff’s Complaint to December 2, 2024. In support, Mars states as follows:

1. On August 6, 2024, Plaintiff filed this antitrust action against the World Federation of Advertisers; Unilever PLC; Unilever United States, Inc.; Mars; CVS Health Corporation; and ØRSTED A/S, demanding a trial by jury. *See* Complaint (ECF No. 1).

2. On August 19, 2024, Plaintiff served Mars with the Complaint. *See* ECF No. 18. Based on this date of service, Mars’ current deadline to respond to the Complaint is September 9, 2024. Mars requests that this deadline be extended to December 2, 2024, to allow it and its counsel sufficient time to prepare a responsive motion.

3. Good cause exists for the requested extension. *See* Fed. R. Civ. P. 6(b)(1)(A).

4. As of the date of this motion, Plaintiff has not yet served all of the Defendants with the Complaint.

5. Mars believes other Defendants, once served, will likely file responsive motions and these motions will likely be overlapping in substance and argument with Mars' motion.

6. The Court has already granted a ninety-day extension of time to another Defendant, extending the time to answer or otherwise respond to Plaintiff's Complaint to December 2, 2024. *See* ECF No. 22.

7. In addition, Mars understands that Plaintiff is conferring with at least one foreign entity Defendant with respect to a waiver of service, which would extend that Defendant's time to answer or otherwise respond to Plaintiff's Complaint by 90 days. Fed. R. Civ. P. 4(d)(3).

8. Plaintiff and Mars intend to work together and with the other Defendants to determine a joint briefing schedule, which they will present to the Court.

9. For all these reasons, granting the requested extension will serve the interests of judicial economy and justice.

10. Plaintiff does not oppose the relief requested herein.

WHEREFORE, Mars respectfully requests that this Court extend the time for Mars to answer or otherwise respond to the Complaint from September 9, 2024 to December 2, 2024.

Dated: September 6, 2024.

Respectfully submitted,

/s/ Karen Hoffman Lent

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Counsel for Mars, Incorporated.

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2024, the foregoing document was filed with the Court's CM/ECF system, which has generated and delivered electronic notices of filing to all counsel of record who have consented to electronic service.

/s/ Katherine Hancock

Katherine Hancock

CERTIFICATE OF CONFERENCE

I hereby certify that on September 6, 2024, I conferred with counsel for X Corp. and counsel for CVS Health Corporation regarding the relief sought by this motion. Neither party opposes the requested relief.

/s/ Philip Vickers

Philip Vickers